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**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SANTA ANA DIVISION**

29 In re Case No. 8:23-bk-10571-SC  
30 THE LITIGATION PRACTICE GROUP, Chapter 11  
31 P.C.,  
32 Debtor. Adv. No. 8-25-ap-01191-SC

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1       **PLEASE TAKE NOTICE** that Plaintiff and Chapter 11 Trustee Richard A. Marshack  
2 (the “Trustee”) and Defendants YNS Funding, LLC (“YNS”), Aly Management, LLC (“Aly”) and  
3 Yitzchok Blum (“Blum,” collectively, the “Defendants,” and together with the Trustee, the  
4 “Parties”), hereby stipulate and agree (the “Stipulation”), through their respective counsel, as  
5 follows:

6           A.     On March 18, 2025, Plaintiff filed a Complaint for: (1) avoidance, recovery, and  
7 preservation of 2-year actual fraudulent transfers; (2) avoidance, recovery, and preservation of 2-  
8 year constructive fraudulent transfers; (3) avoidance, recovery, and preservation of 4-year actual  
9 fraudulent transfers; (4) avoidance, recovery, and preservation of 4-year constructive fraudulent  
10 transfers; (5) turnover; and (6) aiding and abetting against Blum. [Docket. No. 1].

11          B.     The deadline for YNS, Aly, and Blum to respond to the Complaint is April 28,  
12 2025. [Docket No. 4].

13          C.     On April 25, 2025, to allow YNS, Aly, and Blum time to finalize retention of  
14 counsel and to prepare a response, Plaintiff agreed to extend the deadline for YNS, Aly, and Blum  
15 to file and serve any response to Plaintiff’s Complaint from April 28, 2025 to **May 12, 2025**.

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## STIPULATION

WHEREFORE, based on the above and the foregoing, the Parties stipulate and agree as follows:

4           1. The deadline for YNS Funding, LLC, Aly Management, LLC, and Yitzchok Blum  
5 to file and serve any response to Plaintiff's Complaint shall be extended from April 28, 2025 to  
6 **May 12, 2025.**

## **IT IS SO STIPULATED.**

Dated: April 28, 2025

## DINSMORE & SHOHL LLP

By

Christopher B. Ghio  
Special Counsel to Richard A. Marshack,  
Trustee of the LPG Liquidation Trust

Dated: April 28, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Ira D. Kharasch  
Ira D. Kharasch

Dated: April 28, 2025

# MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

By

Christopher B. Harwood (*pro hac vice* application forthcoming)

Attorneys for YNS Funding, LLC, Aly Management, LLC and Yitzchok Blum